RCRA SP.11

RMRS Rocky Mountain Remediation Services, L.L C
protecting the environment

Rocky Flats Environmental Technology Site
P O Box 464
Golden, Colorado 80402-0464
Phone (303) 966-2729
Fax (303) 966-8244

This addresses only the 02'20 event - pls expand to be in concert with following events at 16'33 and 15'50. Same for Attach 2 -

October 17, 1996

96-RM-TA-0155-KH

Karan North
Compliance and Performance Assurance
Building T130C
Kaiser-Hill Company, L L C

DRAFT

RCRA CONTINGENCY PLAN, REQUIRED REPORT - GRK-214-96

The Site had an incidental release of oil containing hazardous substances on October 11, 1996 This event occurred adjacent to Building 774, at the loading location for the tanker that is transferring the oils to Oak Ridge for incineration It was determined that the release did not immediately endanger health or the environment, but that it release did exceed one pint of liquid Due to this, off-site notification was implemented in accordance with the Part B Operating Permit, Part VI - RCRA Contingency Plan Information associated with the off-site notification consisted of the amount of the incidental release, the hazardous constituents that were in the liquid, and the concentrations of the constituents The citation is as follows

> The incidental release that took place on October 11th was hazardous for
> trichloroethene @ 250 ppm
> methylene chloride @ 33 ppm
> 1,1,1- trichloroethane @ 930 ppm
> Approximately 1 gallon of this material was released, contained, ~~and~~ immediately cleaned up, according to approved procedures and disposed of
> There was no threat to human health or the environment

Additional information associated with the incidental release, the management of the situation, and the RMRS decision to release the tanker from the Site are shown in Attachment 1 Attachment 2 contains the information that is required, by the RCRA Contingency Plan, to be submitted to the Director of the Colorado Department of Public Health and Environment and to the Environmental Protection Agency

If you need information in addition to that which is enclosed, please contact me

Gary Konwinski
Environmental Manager

cc

1/38

Attachment 1

The following is a brief summary of the events that took place on October 10 and 11, 1996, relative to the incidental release that occurred adjacent to Building 774

Friday, October 10, 1996

0220 hours A security officer making normal rounds reports liquid being released from an exhaust pipe on a vacuum pump attached to a tanker near 774 The tank trailer was labeled as PCB and hazardous The on-site Hazmat team responded to the location, cleaned up the release, and taped a plastic bag on the exhaust pipe to prevent any further releases An estimated quantity of two pints was cleaned up Liquid Waste Management was contacted

0400 hours The RCRA Contingency Plan was implemented EPA codes for the waste were known to include D009, F001, F002, and F005

0700 hours Shift Manager attended Kaiser-Hill Managers meeting and briefed them on the release and the on-site Hazmat response

1633 hours Building 774 Shift Manager reported that the plastic bag that had been installed on the exhaust pipe had failed and that approximately two gallons of solution had been released The on-site Hazmat team responded and cleaned the area It was determined that the tanker would not be released from the site until senior management from RMRS and Kaiser-Hill concurred that it could be safely shipped Visual inspections of the vehicle were instituted on 30-minute intervals They indicated that no further releases took place

1818 hours Kaiser-Hill reaffirmed that the tanker would not leave the site until John Hill contacted the Shift Manager Preliminary laboratory sample results were received They indicated that no PCB's were found in the released solution Additional results on metals and organics would follow as the laboratory completes the analysis

Saturday, October 11, 1996

1047 hours John Hill reported to the Shift Manager that the RMRS management had indicated that the tanker had suitable integrity and that it could be released ~~form~~ the site Mr Hill concurred with this finding Furthermore, the exhaust pipe that had been responsible for the incidental release had been capped to prevent any further released

1228 hours Shift Manger was contacted by RMRS indicating that the tanker would leave the site The Shift Manager indicated that the appropriate senior level management decisions had been made to release the tanker A driver with Environmental Transportation Services was escorted to the truck

1245 hours Driver was authorized site access and taken to Building 774 and left with the tanker

1550 hours Driver contacted the Shift Manager He noticed that condensation was noticeable at the exhaust stack that had the release RMRS contacted the driver and informed him that it was simply condensation The tanker was hauled to Oak Ridge National Laboratory with no additional releases

DRAFT

Attachment 2

The following is the information that is required for a written report that documents the implementation of the RCRA Contingency Plan

Name, address, and telephone number of the facility owner or operator

U S Department of Energy
P O Box 928
Golden, CO 80402-0928
(303) 966-5878

Name, address and telephone number of facility

Same

Date, time, and type of incident

Friday, October 11, 1996
0220 hours
Incidental release

JW need to identify both incidents and 10/12

Name and quantity of material(s) involved

Trichloroethene @ 250 ppm, methylene chloride @ 33 ppm, and 1,1,1- trichloroethane, @ 930 ppm all of which were contained in an oil base
Approximately a gallon of this material was released

When applicable, an assessment of the actual or potential hazards to human health and the environment, including protective measures taken

The on-site Hazmat team cleaned the area following the release The entire amount of the release as well as soil that it contacted was recovered Due to this, there was no risk to human health and the environment There was no injury and disposed of according to approved procedure

Estimate quantity and disposition of recovered material that resulted form the incident

The absorbent wipes and soil associated with this release totaled approximately three cubic feet
They were containerized and placed into permitted storage as RCRA regulated hazardous waste

DRAFT

Mary, not now, but ASAP we will need -

1) Copy of chem. analyses
2) " of radiation "
3) Where did the cleanup materials go? (e.g. to 90-day site XYZ in B/774)

All of this goes into final HRR - thanks, Jo

RMRS Rocky Mountain Remediation Services, L L C
protecting the environment

DRAFT

Rocky Flats Environmental Technology Site
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October 17, 1996 96-RM-TA-0155-KH

Karan North
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RCRA CONTINGENCY PLAN, REQUIRED REPORT -GRK-214-96

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The incidental release that took place on October 11th was hazardous for
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methylene chloride @ 33 ppm
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Approximately 1 gallon of this material was released, contained, and immediately cleaned up
There was no threat to human health or the environment

DRAFT

Additional information associated with the incidental release, the management of the situation, and the RMRS decision to release the tanker from the Site is shown below Attached to this correspondence is the information that is required to be contained within a written report that is filed with the Director and the EPA

To: Karlan Richards Fax 3359

Gary Konwinski
Environmental Manager

20 Pages

cc

From: Gary Konwinski

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1A
VOLATILE ORGANICS ANALYSIS DATA SHEET

SAMPLE NO. 97L0372-002.002RE DL

Lab Name: RFETS - ROL Contract: NA

Project No.: NA Site: RFETS Location: B559 Group: ROL

Matrix: (soil/water) SOIL Lab Sample ID: VQA1001

Sample wt/vol: 1.0041 (g/mL) G Lab File ID: VQA1001.D

Level: (low/med) MED Date Received: 10/11/96

% Moisture: not dec. Date Analyzed: 10/14/96

GC Column: DB-624 ID: 0.53 (mm) Dilution Factor: 5000.0

Soil Extract Vol: 10000 (uL) Soil Aliquot Volume: 10 (uL)

CAS No.	Compound	Concentration Units: (ug/L or ug/Kg) ug/Kg	Q
74-87-3	Chloromethane	50000	U
75-01-4	Vinyl chloride	50000	U
74-83-9	Bromomethane	50000	U
75-00-3	Chloroethane	75000	U
75-69-4	Trichlorofluoromethane	75000	U
67-64-1	Acetone	50000	U
75-15-0	Carbon disulfide	50000	U
75-09-2	Methylene chloride	50000	J
156-60-5	trans-1,2-Dichloroethene	50000	U
75-34-3	1,1-Dichloroethane	8400	J
156-59-2	cis-1,2-Dichloroethene	25000	U
78-93-3	2-Butanone NOT D035 (reg limit 200ppm)	30000	
67-66-3	Chloroform	25000	U
71-55-6	1,1,1-Trichloroethane	930000	
56-23-5	Carbon tetrachloride	25000	U
71-43-2	Benzene	25000	U
107-06-2	1,2-Dichloroethane	25000	U
79-01-6	Trichloroethene	250000	
78-87-5	1,2-Dichloropropane	25000	U
75-27-4	Bromodichloromethane	25000	U
	cis-1,3-Dichloropropene	25000	U
108-10-1	4-Methyl-2-pentanone	5800	J
108-88-3	Toluene	57000	
	trans-1,3-Dichloropropene	25000	U
79-00-5	1,1,2-Trichloroethane	25000	U
127-18-4	Tetrachloroethene	9200	J
591-78-6	2-Hexanone	25000	U
124-48-1	Chlorodibromomethane	25000	U
108-90-7	Chlorobenzene	25000	U
100-41-4	Ethylbenzene	91000	
	m,p-Xylene	550000	
95-47-6	o-Xylene	420000	
100-42-5	Styrene	25000	U

F001/F002 33ppm
6 ppm
F005 30 ppm
F001/F002 930 ppm ~ .1%
DO40 — 250ppm
1 = 0.5 ppm
gas
91
550
420

FORM I VOA 3/90

Norm Stoner
x4289

4 liq - D.I. + water mix
Sludge - SOLET
PCB - 12 ppm
Form I - VOA - 8260 GC/MS

1A
VOLATILE ORGANICS ANALYSIS DATA SHEET

SAMPLE NO. first run
SVL0372-009.003

Lab Name: RFETS - ROL Contract: NA
Project No.: NA Site: RFETS Location: B559 Group: ROL
Matrix: (soil/water) SOIL Lab Sample ID: VOAP02
Sample wt/vol: 3.0020 (g/mL) G Lab File ID: VOAP02.D
Level: (low/med) MED Date Received: 10/11/96
% Moisture: not dec. Date Analyzed: 10/11/96
GC Column: DB-624 ID: 0.53 (mm) Dilution Factor: 1700.0
Soil Extract Vol: 10000 (uL) Soil Aliquot Volume: 10 (uL)

Concentration Units: (ug/L or ug/Kg) ug/Kg

CAS No.	Compound		Q
74-87-3	Chloromethane	17000	U
75-01-4	Vinyl chloride	17000	U
74-83-9	Bromoroethane	17000	U
75-00-3	Chloroethane	25000	U
75-35-4	1,1-Dichloroethene	25000	U
67-64-1	Acetone	17000	U
75-15-0	Carbon disulfide	17000	U
75-09-2	Methylene chloride	21000	
156-60-5	trans-1,2-Dichloroethene	17000	U
75-34-3	1,1-Dichloroethane	4500	J
156-59-2	cis-1,2-Dichloroethene	8500	U
78-93-3	2-Butanone	8500	J
67-66-3	Chloroform	8500	U
71-55-6	1,1,1-Trichloroethane	700000	E
56-23-5	Carbon tetrachloride	8500	U
71-43-2	Benzene	8500	U
107-06-2	1,2-Dichloroethane	8500	U
79-01-6	Trichloroethene	280000	
78-87-5	1,2-Dichloropropane	8500	U
75-27-4	Bromodichloromethane	8500	U
	cis-1,3-Dichloropropene	8500	U
108-10-1	4-Methyl-2-pentanone	4300	J
108-88-3	Toluene	46000	
	trans-1,3-Dichloropropene	8500	U
79-00-5	1,1,2-Trichloroethane	8500	U
127-18-4	Tetrachloroethene	8500	J
591-78-6	2-Hexanone	8500	U
124-48-1	Chlorodibromomethane	8500	U
108-90-7	Chlorobenzene	8500	U
100-41-4	Ethylbenzene	70000	
	m,p-Xylene	510000	E
95-47-6	o-Xylene	340000	E
100-42-5	Styrene	8500	U

FORM I VOA 3/90

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1A

VOLATILE ORGANICS ANALYSIS DATA SHEET

SAMPLE NO.
97L0972-003.003

Lab Name: RFETS - ROL Contract: NA

Project No.: NA Site: RFETS Location: 881G Group: ROL

Matrix: (soil/water) WATER Lab Sample ID: VOAP02

Sample Wt/Vol: 5.0020 (g/mL) G Lab File ID: VOAP02.D

Level: (low/med) Date Received: 10/11/96

% Moisture: not dec. Date Analyzed: 10/11/96

GC Column: DB-624 ID: 0.53 (mm) Dilution Factor: 1700.6

Sample Extract Vol: 10000 (uL) Sample Extract Aliquot Volume: 10 (uL)

CAS No.	Compound	Concentration Units (ug/L or ug/Kg) ug/Kg	Q
75-25-2	Bromoform	8500	U
79-34-5	1,1,2,2-Tetrachloroethane	8500	U
	1,3-Dichlorobenzene	8500	U
	1,4-Dichlorobenzene	8500	U
	1,2-Dichlorobenzene	8500	U

FORM I VOA 3/90

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1A
VOLATILE ORGANICS ANALYSIS DATA SHEET

SAMPLE NO.
97L0372-002.002RE

Lab Name: RFETS - ROL Contract: NA

Project No.: NA Site: RFETS Location: 8889 Group: ROL

Matrix: (soil/water) SOIL Lab Sample ID: VOAQ01

Sample wt/vol: 1.0041 (g/mL) G Lab File ID: VOAQ01.D

Level: (low/med) MED Date Received: 10/11/96

% Moisture: not dec. Date Analyzed: 10/14/96

GC Column: DB-624 ID: 0.53 (mm) Dilution Factor: 5000.0

Soil Extract Vol: 10000 (uL) Soil Aliquot Volume: 10 (uL)

CAS No.	Compound	Concentration Units: (ug/L or ug/Kg) ug/Kg	Q
75-25-2	Bromoform	25000	U
79-34-5	1,1,2,2-Tetrachloroethane	25000	U
	1,3-Dichlorobenzene	25000	U
	1,4-Dichlorobenzene	25000	U
	1,2-Dichlorobenzene	25000	U

FBI OIL SHIPMENT ISSUES

The ITT tanker trailer used to ship LLM liquids to the ORR TSCA Incinerator is owned and maintained by the Oak Ridge K-25 Site. When a liquid waste shipment is made to the K-25 Site, a commercial transporter is subcontracted to pick up the trailer at the K-25 site, deliver it to the waste generator/shipper, and return the filled trailer to K-25 It is customary for a representative of the K-25 site to visit a waste generator the first time the generator ships waste to K-25, for the purpose of instructing the generator

As is customary with a generator's first shipment to K-25, a representative of the K-25 site visited RFETS when we loaded our first shipment of waste on September 23-24, and walked us through the initial start-up, loading evolution, and shut down. Upon our request, and well prior to the scheduled ship date, K-25 also provided RFETS with a copy of their written tanker loading/operating procedure, which was incorporated into RFETS's loading/shipment Work Instructions

This second waste shipment from RFETS loaded on October 10 and 11 was executed by RFETS personnel only.

A number of factors impacted the waste loading operation, and contributed to the vacuum pump condensate spills

Under a best-case scenario, the loading and subsequent shipment could have been completed in one day, with a total waste loading time of approximately nine hours. However, the driver was two hours late in arriving at RFETS, and another hour was lost because the vacuum pump's diesel engine would not start and had to be jumped. Therefore, loading operations were ceased at 4.00 on Thursday, with resumption planned for Friday morning

from the instruction and experience of the K-25 representative

On Thursday, the vacuum pump (once started) ran as expected, and slightly over half of the shipment was loaded As expected, the vacuum pump exhaust pipe "spit out" a small volume of combined vapors and condensate upon start up, but the exhaust turned to light vapor only once the system warmed up and reached steady state operation During the last 4 5 hours of the day's five hours of waste loading, and during system shut down, virtually no free liquid was emitted from the exhaust system We experienced this same sequence during the first waste loading evolution two weeks ago

which was captured by Kim wipes and plastic bags

Since no free liquid was observed being generated by the exhaust system, and none was expected, the exhaust pipe was not taped or otherwise sealed upon routine shutdown A wad of Kim wipes was stuffed into the pipe, however, as a precaution against residual moisture Since the tanker was only partially filled and could not exit and re-enter the PA, the tanker had to be moved to PACS 1 for the night and watched by WSI

Shift to next paragraph

When the tanker was pulled from the loading site and up the hill south east of 774, a small amount of exhaust condensate, which had apparently collected in the bottom of the exhaust muffler, dribbled out the exhaust pipe and was released to the road surface When the tanker was parked at PACS 1 and secured for the night, no liquid was

The total volume of liquid released in both of the locations has been estimated at approx. 1 pint

dripping from the exhaust pipe, and there was no indication that liquid had been released when leaving 774.

Early Friday morning, when WSI was making their required security inspections, a puddle of liquid was observed beneath the exhaust pipe, the Haz-Mat team was called, and occurrence notifications began. Investigation of the release at PACS 1 led to discovery of the release at 774 It became apparent that when the tanker.....

An evaluation of the liquid release was carried out early Friday morning. Since the source of the liquid release was well known, additional precautions for capturing free liquids from the exhaust could be taken. Sampling had been organized to confirm the evaluation that the liquid released was condensate and not PCB-contaminated waste oil (visual indication also suggested that the liquid released was not waste oil), the decision was taken to proceed with the loading operation.

As instructed by the K-25 Site representative, a plastic bag and several kim wipes had been placed under the vacuum pump exhaust pipe prior to system start-up on Thursday, to catch the anticipated initial spurt of condensate This procedure was repeated with the resumption of loading on Friday. The condensate release on Thursday evening was unexpected, and therefore we had not taken measures to prevent or capture this emission However, liquid condensate was expected from cold start-up, and measures were taken to capture this liquid. In addition, the bag used to capture this liquid was left in place after the system reached steady state and only vapor was being emitted, just in case a small amount of liquid was released comparable to Thursday night's release Since a "worst case" scenario was planned for, based on K-25's operating instructions and our own experiences, and corresponding control measures were in place, we had no reason not to resume loading operations

Loading operations throughout Friday went exactly as anticipated A small amount of free liquid condensate was generated and captured upon start up, and, once warmed up, the vacuum system emitted only vapor exhaust. At approximately 3.00 in the afternoon, and after several hours of normal operation, the Sampling team arrived and sampled the liquid condensate collected in the bag under the exhaust pipe This sampling was performed to characterize and properly manage the material that had been spilled the night before. The bag barely had enough free liquid condensate for the sample team to collect the appropriate samples. In addition, radiological surveys were taken of the spill sites. Radiological Engineering had previously evaluated the waste being loaded, and prescribed no radiological controls while loading and handling this waste These precautionary surveys confirmed there were no radiological concerns associated with the condensate releases

As anticipated, the oil level in Tank T-102 in Building 774 dropped to the level of the upper drain line at approximately 4.30 PM The upper drain line was closed, and loading continued from the lower drain line only. Shortly thereafter, sparging in the tanker trailer indicated that the level in Tank T-102 had dropped to the level of the lower drain line Once we confirmend that the oil had in fact dropped to this level, and the tanker was pulling air from the tank, ~~the tank~~ was declared empty for shipment purposes, the lower drain line was closed, transfer lines and hoses were evacuated, and tanker shutdown was begun

Simultaneous to beginning tanker shut down, a significant volume of liquid was observed collecting on the ground beneath the exhaust pipe Again, the Shift Superintendent was notified, the Haz-Mat team was called to respond, and tanker shutdown was completed As mentioned earlier, a plastic bag and kimwipes had been placed under the exhaust pipe to collect dripping condensate, and the bag was of sufficient capacity to contain the volume of liquid released However, a number of factors contributed to the failure of the bag to contain the released liquid

11

First, the exhaust pipe exits the tanker trailer fender above the rear wheel of the tractor and the mud flap for this tire, which does not provide for a level or stable platform on which to place a bucket, drip pan, or other rigid containment system. Secondly, the liquid released was part hot vapor and part hot liquid, which caused the bag to soften and slip from its secured position on the tire and mud flap There is also no mechanism or appendages on the bottom of the trailer fender on which to fasten a bag, pail, or other container Finally, any containment system placed under the exhaust pipe must allow vapor to freely escape as emitted, as vapor is the primary and intended emission from this system; a bag can not be taped securely to the exhaust pipe itself

As mentioned earlier, a number of causes contributed to these releases

- The K-25 representative indicated that tanker could be loaded from individual drums in approximately 45 minutes, (using a two inch "stinger") Since we were drawing liquid from Building 774 through a [redacted] one inch line, we estimated loading would take from two to four hours per tanker load. In fact, actual loading took approximately nine hours The extended waste loading time was probably a key factor in generating more liquid condensate than K-25 had ever experienced before
- If the tanker had arrived on schedule, and the vacuum pump motor would have started without needing a jump from the garage, the loading operation may well have been completed in one day, eliminating one shutdown and one startup, and reducing the volume of condensate produced
- Obviously, the vacuum pump exhaust system is not designed to capture, store, and release liquid condensate on a regular and controlled basis. Several design flaws require modification
- The demister segment of the vacuum system may have accumulated excessive liquid, which may have contributed to excessive condensate generation and release Draining the demister is not included in K-25's operating instructions, and was not addressed by the K-25 representative as something that needed to be watched, maintained, or drained
- The tanker capacity is 6,000 gallons (water), and only 4,600 gallons was loaded to the tanker for the second shipment, so we never neared tanker capacity However, sparging in the tanker caused by sucking air from from the emptied Tank T102 may have caused a slight amount of liquid to splash into the vacuum intake system, and pass through the exhaust system

Corrective Actions.

The following requirements ~~will~~ must be implemented (predominately by K-25 Operations) prior to initiating the next waste loading operation to this tanker trailer

- Repair and/or maintenance of the vacuum pump motor battery, alternator, and electrical system gauge will be performed and documented When the tanker next arrives at RFETS, this system will be tested prior to bringing the tanker on site If the motor fails to self start as it should, the tanker will not be brought on site for waste loading

- The vacuum pump exhaust muffler should be equipped with a system or method to drain accumulated free liquid, as the muffler is the low-point throughout the exhaust system for liquid condensate accumulation
- The exhaust pipe will be fitted with a tight fitting end cap capable of preventing release of accumulated liquids, even those due to changes in ambient temperature and pressure while the system is shut down
- The exit pipe of the exhaust system should be relocated farther to the rear of the tanker fender, to provide for better access for a containment system to be placed/attached under the exit pipe The current exit pipe location above the tire and mud flap is difficult at best to manage
- K-25 shall provide a schematic and operating instruction for draining the vacuum demister and entire tanker system RFETS needs a better understanding of the system's capabilities and possible fail points
- The vacuum pump motor fuel tank does not have a full-empty gauge, even though the K-25 operating procedure indicates that running the tank dry can cause significant damage to the engine
- K-25 will be requested to fix a small hydraulic fluid leak in the hydraulic discharge valve at the rear of the tanker.
- Receipt of the K-25 tanker should include certification of 1) vacuum pump motor fuel tank filled immediately prior to departure from K-25, 2) demister drained, 3) vacuum exhaust system drained of free liquid, and 4) battery, alternator, and electrical system serviced and operating
- RFETS Work Instruction will be modified to include a requirement for adequate closure and sealing of the exhaust system prior to moving the tanker or leaving it unattended
- Regardless of modifications made to the tanker, adequate, rigid secondary containment will be in place at all times when exhaust system is not securely sealed.
- As an administrative side note, the truck driver that delivered the K-25 tanker will not be allowed to return, as his repeated tardiness contributed significantly to loading schedule delays, which in turn contributed to generation of an excessive amount of exhaust condensate.

CAS# 1336-36-3 PCB's (1) CERCLA RQ 1b. EPA Title III Lists of Lists
234 - product
< 2 ppm - condensate
@ detection limit of 2 ppm

Tank 103 Chemistry Data
Items M11, M12 and M13

Substance ID	Concentration (estimated)	Substance Name
7439-92-1	39 ug/g	Lead
75-09-2	0 28 g/L	Methylene Chlonde
91-57-6	0 076 g/Kg	2-Methylnaphthalene
85-01-8	0 091 g/Kg	Phenanthrene
206-44-0	0 075 g/Kg	Fluoranthene
117-81-7	0 22 g/Kg	bis(2-Ethylhexyl)phthalate
117-84-0	0 052 g/Kg	Di-n-octylphthalate
	923 g/Kg	Unknown hydrocarbon

Tank 103 Radiochemistry Data
Items R7, R8 and R9

Isotope	Estimated Quantity	Units
Pu-238	0 0882	pCi/g
Pu-239	3 95	pCi/g
Tc-99	11 0	pCi/g
U (alpha activity)	5 67	pCi/g
Np-237	0 00	pCi/g
Th-228	0 213	pCi/g
Th-230	0 471	pCi/g
Th-232	0 0336	pCi/g
Cs-137 (gamma)	0 106	pCi/g
Pa-234m (gamma)	-19	pCi/g
Th-234 (gamma)	6 01	pCi/g
U-235 (gamma)	0 203	pCi/g

Jim M 666-5561
Warehouse 966-5745
Joe Molter 460-0411
7714 Page

John Hill
215-0528 bad #

John Wrapp 665-9875
Karan North (303) 582-3265
1-800-514-8786 page

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Jim:

The incidental release that took place on October 11th was hazardous for:

Trichloroethene	@	250 ppm	F001/F002
Methylene Chloride	@	33 ppm	
1,1,1 - Trichloroethane	@	930 ppm	

Approximately one gallon of this material was released, contained & immediately cleaned up.

There was no threat to human health OR the env.

Larry Powers

The following is a list of information, actions, and decisions that must be recorded in the Shift Superintendents log book when the RCRA Contingency Plan is implemented and a formal written report of the incident will be submitted to CDPH&E within 15 calendar days

- Date and time the hazardous waste incident was identified or discovered
- Location of incident (including room number if incident is within a building)
- Name of released material (including applicable hazardous waste codes).
- Quantity of material released (in pounds)
- Extent of release (including statement if captured by secondary containment or escaped to impact air, soil, surface water, or ground water Statement should include the name/title of manager who made this determination)
- For incidental releases, name/title of manager responsible for response (including cleanup of released material)
- For releases requiring an emergency response (as defined by 29 CFR 1910 120), name/title of person in charge of response (if different than Shift Superintendent)
- Summary of steps taken to contain and cleanup the release (including liquids, contaminated sorbent, and contaminated soil)
- If decision is made not to containerize the contaminated soil, name/title of manager who made this decision
- Name/title of manager responsible for disposition of recovered material and initial disposition of this material

FACSIMILE COVER SHEET

DATE: 10/15

FROM: SHIFT SUPERINTENDENT'S OFFICE Joe Hebert
BUILDING 115, EMERGENCY OPERATIONS CENTER
ROCKY FLATS

TELEPHONE 966-2914 FAX #966-3261

TO: (NAME) Gary Kowinski

(DEPARTMENT) ROCKY

(PHONE)

(FAX #) 8244

MESSAGE / INFORMATION

S/S Log Pages 85-94

TOTAL PAGES SENT (INCLUDING COVER SHEET): 11

17

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10/10/96 Thurs Night Cast

0005 Authorized a tow truck driver on site to tow a POV belonging to Brian Berling from the Garage. Brian met the driver at the West Gate and escorted him to his vehicle

0020 Received a call from WSI reporting a small leak under a tanker truck parked east of the Secondary Alarm Station. Responded and observed a small puddle (approx 1 cup) of unknown liquid on the pavement. Leak was from an exhaust pipe from a vacuum pump mounted on the front of the tanker trailer. Tanker was placarded with "PCB" labels and a #3082 hazard label (Environmentally Hazardous Waste) The tanker contained waste oil from a waste oil tank in Bldg 774. It is being filled for transport to Oak Ridge. Contacted the 771/774 Shift Mgr, Joe Sena, to respond. Contacted Fire Dept Hazmat to respond. Contacted the Bldg 774 Shift Mgr - Joe Gonzales and the 774 Program Mgr Rick Wagner at home to respond. They contacted Karlan Richards, RMRS Environmental to respond. The oil was confirmed to be RCRA hazardous and contained PCBs. Suspect the exhaust condensate which leaked to the pavement to be PCB contaminated. Fire Dept Hazmat cleaned up the pavement and taped a plastic containment bag around the exhaust pipe to collect any additional leakage. Cleanup waste was taken to Bldg 774 for proper disposal. WSI reported a trail of similar substance on the road east of Bldg 774. Responded with Fire Dept Hazmat, 771 & 774 Shift Mgrs and 774 Program Mgr and found two trails of same substance, one ≈ 30' in length and one ≈ 10' in length. Estimate a total of 2 pints when combining the two locations. Fire Dept

10/11/96 Thurs Night Cont

~~[illegible]~~ Hazmat cleaned up the area and waste was properly disposed of in Bldg 774. Waste Regulatory Programs was called and paged and a message was left on their answer. PMOC was notified as well as the DOE Manager. Bldg 774 Mgmt reported they were contacting the labs to take samples of the asphalt and based on results take appropriate action. The RCRA Contingency Plan was enacted at ≈ 0400 hrs. Notifications under the plan will be made by Occurrence Investigations. EPA Codes for waste oil are D001, F001, F002, F005

0527 - Eric Schwendeng, Bldg 776/777 Shift Mgr called to report the Bldg was operational.

0610 - Authorized the Cafeteria vending truck driver on site to Bldg 130. Driver forgot his badge

0653 - Nancy Holmes, Bldg 779 Shift Mgr called to report the Bldg was operational.

10/11/96 FRI-DAY 0645 - 1845 M. F. Hickey

0700 - Attended K-H Mgrs meeting & briefed on S/S Daily Summary & the HazMat response (See entry 0228)

0725 - Briefed Fla Phillips & John Hill on oil leak potentially contaminated with PCB's from tanker truck.

0815 - Requested by Skip Chandler to respond to excavation at Sewage Treatment Plant with S/S camera. Side of excavation had slumped during night causing a water line break (previously repaired leak), and bottom of hole had ponded in

10/11/96 FRI-DAY CONT'D

[illegible] cond[illegible] RMRS [illegible] personnel [illegible]

0818 - Bob Bo[illegible] operators in B/9[illegible]

0920 - Resp[illegible] leak at [illegible] was gauge [illegible] Accumulated [illegible] Ernie Marino [illegible] the problem [illegible] cleanup.

0948 - Revis[illegible] HazMat respons[illegible] separating th[illegible] the facts wo[illegible] were being [illegible] order that th[illegible] vulnerable [illegible] has been p[illegible] occurs. Ev[illegible] pursued af[illegible] management

1015 - Joe G[illegible] that he ha[illegible] Team had ta[illegible] him that [illegible] both the fa[illegible] & also be s[illegible]

~1145 B/886

19

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74. Waste
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ex. PMOC
Manager. Bldg
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The RCRA
at ≈ 0400 hrs
ll be made
EPA Codes for waste
74 Shift Mgr called
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got his badge
ift Mgr called
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& briefed
hat response
oil
is for
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with
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added in

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10/11/96 FRIDAY CONT'D

several areas, One of these areas had already been cordoned due to Road concerns. Subcontractor, Western Summit, RMRS Safety, Ind Hygiene, STP & regulatory reporting personnel were all on scene. Tom Bourgeois will update.

0918 - Bob Baumgarten, NDT, reported restarting NDT operations in B/991.

0920 - Responded with Fire Dept on report of old oil leak at Bldg 920, emergency generator probably caused when garage personnel periodically refill with diesel. Accumulation did not merit a HazMat cleanup. Contacted Ernie Marino & Jack Eberle who were aware of the problem & will contact Garage personnel to effect cleanup.

0948 - Revisited the STP excavation with the HazMat response group for orientation. A small berm separating the potentially contaminated water from the fresh water had been built. Also measures were being taken to stabilize slumped area in order that the Site's main sewer line not be vulnerable to breakage. A contingency plan has been put in place in case such a breakage occurs. Further remediation efforts will be pursued after discussion with RMRS senior management & K-H Mark Spiers.

1015 - Joe Gonzales, B/774 Shift Mgr reported that he had understood that Fire Dept. HazMat Team had taken samples for analysis. I advised him that he needed to get a sample team for both the tank holding the waste material in B/774 & also to sample (if possible) the stored asphalt.

1145 B/886 Shift Mgr reported going to Ops Condition II

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10/11/96 FRIDAY CONT'D

1250 – S/S on duty served with subpoena by DOE attorney Wood Rigsby to report for a deposition to US Court of Federal Claims on case of Rockwell Intl Corp v. The United States of America (Defendant). S/S had been advised earlier at 0900 by Dee McCart that this was impending.

1420 – Joe Gonzales updated on Status of samples. PCB results should be back today & the stained asphalt was impossible to sample.

1446 – Bob Baumonge reported completion of NDT Ops

ROCKY

1527 – B/779 Shift Mgr reported she was turning the facility over to B/776 Shift Mgr, Joe Goggin, who is on-call this weekend

1529 – B/559 Shift Mgr, Laughlin reported securing the facility for the weekend. Kerry Smith is on call.

1630 – Tom Bourgeois provided status update on 995 STP excavation. Is faxing his log.

1633 – B/774 Shift Mgr Joe Gonzalez reported that the bag underneath the Tanker truck outside B/774 had just "failed" & dumped approx 2 gallons of potentially PCB contaminated oil on both asphalt & ground. Responded with the Fire Dept Hazmat Team. Upon confirmation that ~~IHSS~~ the area was not an IHSS area, Hazmat team proceeded to clean up the ground and placed it in 5 bags and left the material double bagged. S/S advised that the tanker which has now been filled today to greater than 90% of its capacity, approx 4780 gallons, should not be released for interstate road

10/11/96 FRIDAY CONT'D

[illegible]
concur[illegible]
further look[illegible]
Gary Konwinski[illegible]
Edwin Wrapp [illegible]

1730 – Authoriz[illegible]
WSI for Bl[illegible]
to continue dri[illegible]
His page is [illegible]

1915 – Cleared
EOC. K-H [illegible]

1632 – Received
to check there's
he left left[illegible]

10/11/96 Fri Night
1845 – 0645

1419 Received
Joe Ebersole [illegible]
was unusual
for repairs un[illegible]

1818 Made co[illegible]
who responded
See 1633 here
with D.W. Ferre[illegible]
them on the S[illegible]
the S/S office
PA w/o [illegible]
personal disc[illegible]
mgr. That PA
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Waste Regulator
required notif[illegible]

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...with subpoena by
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... would be back today
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... to Shift Supv, Joe
... weekend.

... Laughlin reported
... weekend. Kerry

... status update on
... this log.

...ley reported
... truck outside
... approx 2 gallons
... oil on both asphalt
... HazMat team
... area was not on
... added to clean
... bags and left
... advised that the
... today to greater
... 4700 gallons,
... the road

10/11/96 Swing cont'd — transport until both RMRS & KH senior management concur that they have confidence there will be no further leaks. Contacted Jim McAnally, Martin Wheeler, Gary Konwinski of RMRS & advised of same. Also notified Steven Wrapp to determine need for additional RCRA contingency plan.

1730 – Authorized access to B/124 to be provided by WSI for Blaine Wright who needs a water supply to continue drilling operations for Parks Construction. His page is 1-800-277-6958

1915 – Cleared response from B/774 & returned to EOC. K-H agent notified including D. Ferrera.

1632 – Received request from David Garter 432-4105 to check Men's locker room in B/334 since he believes he left his wallet there.

10/11/96 1845 – 0645 Gary J Cammed

Fri Night — 1419 Received under message from DCI Maintenance Joe Edwards reporting that the EEEN at Post 970 was inoperable. Vendor will not be able to respond for repairs until Monday, 10/14. Notified WSI.

1818 – Made contact with on-duty S/S Margaret Hickey who responded to a tanker truck leak at Bldg 774. See 1632 hrs. Following return to Bldg 115, made contact with D.W. Ferrera, John Hill, and Bob Card and briefed them on the situation. Per agreement with John Hill, the S/S office will not allow the tanker to leave the PA w/o verbal authorization from John Hill or his personal designee. Confirmed with Bob Mather, program mgr. that Oak Ridge was contacted regarding the problems with the tanker. Confirmed with John Wrapp, KH Waste Regulatory Programs that WRP had the lead for required notifications. 1818 Sample results indicate ≤2 ppm cont.

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10/11/96 Fri Night Cont

2400 cont. PCB which is less than the regulated limit of 50ppm per Karen Sorth. Substance ~~[struck]~~ is not a reportable quantity. Bob Motter reported that the exhaust pipe will be capped/plugged and an additional plastic bag will be taped over the capped pipe as a secondary containment for transport to Oak Ridge. RMRS set up 30 minute surveillance by RMRS personnel to monitoring to make sure no additional leaks. Treated RCRA Contingency Plan @ ~~2400~~ 1930 hrs

2051 - Received a call from Dale Machlum, 707 Shift Mgr reporting an RCT with an apparent broken blood vessel in his eye. The injury occurred while at work but was not considered a work related injury by Dale or the injured party. Contacted Fire Dept to send EMTs to the Shift Mgrs office to evaluate. Patient was found to be OK. He will be kept out of the controlled area for the remainder of the shift but allowed to continue work.

0141 Received a call from WSI reporting a strange vehicle on Indiana. The vehicle was driving slowly sometimes with lights on and sometimes with lights off. There appears to be someone walking in front of the vehicle. Advised Charly 1 to contact Jeffco. Agreed not to send a WSI unit out on Indiana to check it out.

0217 - Rich Grezyara Bldg 371 Shift Mgr called to report a ~~temporary~~ smell of burnt rubber in stairwell. Hg, SOEs and Liq Waste personnel responded and checked all systems with everything operating as designed. Liq Waste will do 10-15 minute checks and report if there are any problems.

10/11/96 Fri Night Cont

~~0222~~ - Rich Gra... report that t... odor in stair... ... for the p... not function... and the A p... form is bein... occurrence rep...

0430-0500 Re... ... found ... to having gett...

0432 Hold Shif...

0636 - Tony Hen... report he ... be working ...

10/12/96 SAT-DAY

0645 - 184...

0705 - PER... ANTI-C ... @ BLDG 4... BE INTER... CONTAMIN...

0725 - ANTI... AREA) FOR...

0737 - STEW... OF PLANN... (0800-1200 H...

0805 - PER... TIM HED...

10/11/96 Fri Night Cont — 0322 Rich Granzow, Bldg 371 Shift Mgr called to report that the SETs isolated the cause of the odor in stairwell 6. They found the 925 B Pump ... for the plant air ... bound up and not functioning. The B pump was shut down and the A pump was activated. A work control form is being written. Not linked to 14S. No occurrence report required.

0430-0500 Received several calls from Larry Hawkins girl friend informing me about the progress Larry is having getting Theresa Hawkins out of jail.

0430 Held Shift Activity Meeting with WSI Trantanella.

0636 Tony Hernandez, DCI Maintenance called to report he & 8 other maintenance workers would be working on Bldg 663 for ≈ 9 hrs today.

10/12/96 SAT-DAY 0645 - 1845 M T. Deal

0705 - PER DON COBERLY, REPACKING OF ANTI-C CLOTHING (L-59 CONTAINERS) @ BLDG 444 TODAY. ALSO, THERE WILL BE INTERIOR PAINTING OF FIXED CONTAMINATION SPOTS INSIDE OF BLDG. 663.

0735 - AUTHORIZED SITE ACCESS (T-130 AREA) FOR MIKE MAYDER OF CANTEEN

0737 - STEVE BUTLER, DOE, NOTIFIED S.S OF PLANNED BUFFER ZONE TOUR TODAY, (0800 - 1200 HOURS). CAS ALSO NOTIFIED.

0805 - PER PHONE CALL REQUEST FROM TIM HEDAHL, STATUSED HIM ON TANKER

92

10/12/96 SAT-DAY (CONT.)

TRUCK LEAK @ BLDG 774 (SS LOG @ 1633 HOURS - 10/11/96).

1047 - JOHN HILL ADVISED ME THAT FOLLOWING DISCUSSION WITH RMRS MANAGEMENT HE IS NOW AUTHORIZING THE SHIPMENT OF THE TANKER TRUCK @ BLDG 774 (SS LOG @ 1633 HOURS - 10/11/96). THE PROBLEM WITH THE VACCUM PUMP ON THE TRUCK (WHERE LEAK OCCURRED) IS REPAIRED. ADDITIONALLY THE VAPOR TRAP IS EMPTY AND HAS BEEN CLEANED OUT.

SHORTLY AFTER JOHN'S CALL, DOUG PARKER CALLED INQUIRING IF THE TRUCK WILL NEED TO LEAVE TODAY. I CONTACTED BOB MOLTER (RMRS) WHO STATES IT WILL NOT BE SHIPPED TODAY. I CONTACTED DOUG TO INFORM HIM THAT TRAFFIC'S ASSISTANCE IS NOT NEEDED TODAY.

1114 - RECEIVED REPORT FROM JEFF (TELECOMM) OF A BURNING ELECTRICAL ODOR IN BLDG 125, HIGH BAY AREA. CONTACTED FIRE DISPATCH WHO TONED OUT RESPONSE. RESPONDED, CAUSE IS A BURNED OUT BALLAST. FIRE DEPARTMENT ISOLATES POWER TO FIXTURE. THE SMELL IS NOT DISSIPATING (CONFIRMED BY SOL @ 1200 HOURS). CONTACTED FAC OPS ON CALL MGR (ERNIE MARINO) TO PROVIDE ELECTRICIANS TO FORMALLY LO/TO, POWER SOURCE AND/OR REPLACE BALLAST. LOCATED ROOM 125, PANEL LP1G-5.

10/12/96 SAT-DAY (CONT.)

1228 - DOE
THAT THE
TANKER (@
PARKER IN
RESPOND A
TRANSPORT
WILL BE

1235 - DOE

1245 - AN
DRIVER (J

1250 - SPO
A SUBCON
HART HUB
CONCLUDES
BADGE HAS
HIS CHECK
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GET CHE
BADGE (E

1255 - TOM
THAT HE A
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LP1G-5 (C
BALLAST (A

1550 - RECE
SERVICES' DR
TANKER FI
CONCERNED
PIPE FAC
DURATION
MOLTER (R

25

93

74 (SS LOG @	10/12/96	1228 - DOE (JOE) MOLTER CALLED TO REPORT
	4-DAY	THAT THEY DO WANT TO TRANSPORT
	(OUT)	TANKER @ BLDG 774 TODAY DOUG
ED ME THAT		PARKER TRAFFIC CONTACTED AND WILL
WITH		RESPOND. A DRIVER WITH 'ENVIRONMENTAL
IS NOW		TRANSPORTATION SERVICES' (JAMES SCHILD)
MENT OF		WILL BE ESCORTED BY DOE TO BLDG. 774.
BLDG 774 (SS LOG		
E PROBLEM		1235 - DOE BUFFER ZONE TOUR COMPLETED.
ON THE		
IRED) IS		1245 - AUTHORIZED SITE ACCESS FOR
E VAPOR		DRIVER (JAMES SCHILD) TO BLDG. 774 YARD.
BEEN CLEANED OUT		
DOUG PARKER		1250 - SPO @ 920 POST CALLED REQUESTING
E TRUCK WILL		A SUBCONTRACTOR EMPLOYEE WITH 'McCLAIN
CONTACTED		HART' HUBERT VON FELTZ, WHO HAS
TO STATES IF		CONCLUDED HIS CONTRACT (HIS ACCESS
TODAY I		BADGE HAS EXPIRED) HE NEEDS TO GET
FORM HIM		HIS CHECK @ T-891. I AUTHORIZED
E IS NOT NEEDED		SPO TO ESCORT HIM TO TRAILER TO
		GET CHECK AND ALSO REQUESTED HIS
		BADGE (EXPIRED) BE CONFISCATED
FROM JEFF		
URNING		1255 - TONY FERNANDEZ (FAC OPS) REPORTED
BLDG 125,		THAT HE AND ANOTHER SUPERVISOR - BOB
UTACTED FIRE		MANVEL WILL APPLY LO/TO TO PANEL
OUT RESPONSE.		LP1G5 @ BLDG. 125 UNTIL THE
BURNED OUT		BALLAST CAN BE REPLACED, MONDAY, 10/14
ENT ISOLATED		
E SMELL IS		1550 - RECEIVED CALL FROM 'ENV. TRANSP.
FERMS BY SOE		SERVICES' DRIVER JAMES SCHILD TRANSPORTING
ES FAC OPS		TANKER FROM BLDG. 774 HE WAS @ I-76 TRUCK STOP
NING) TO		CONCERNED THAT BAG SEALING EXHAUST
D. FORMALLY		PIPE FROM VACUUM PUMP HAS LIQUIDS
R REPLACE		BUILDING UP I CONTACTED JOE
EL LP1G-5)		MOLTER (RMRS) WHO SAID IT WAS

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94.

10/12/96 SAT-DAY (CONT.) EXPECTED CONDENSATE THAT WOULD BACK UP INTO AN OUTER PIPE IF BAG BECAME TOO FULL. THE CONDENSATE WAS SAMPLED YESTERDAY AND IS <2 PPM PCB. I HAD JOE SKUPAGE DELIVER AND EXPLAIN IT TO HIM. IN A FOLLOW-UP CALL JOE EXPLAINED THAT THE TANKER BELONGS TO OAKRIDGE AND THIS IS THE FIRST TIME WE'VE USED IT, ALTHOUGH WE WILL NEED THIS TYPE OF TANKER FOR FUTURE SHIPMENTS OUT OF BLDG. 774. ALSO, OAKRIDGE HAS BEEN TOLD NOT TO SEND US THIS TYPE OF TANKER AGAIN UNLESS THEY MODIFY IT WITH A PERMANENT CAP TO RECTIFY THE CONDENSATE LEAK ISSUE. STATUSED PM OC - D. FERRERA.

10/12/96 SAT NIGHT 1845 - 0645 Frank McMenus

1900 - 371 STATE MCR REPORT A BREAKER HAD TRIPPED & THE BLDG SOE'S ARE CURRENTLY STARTING PROCEDURE TO RE-SET. PLANT POWER WAS NOTIFIED TO CHECK ON ANY POSSIBLE BUMPS THAT MAY HAVE OCCURRED

1930 - 371 RESET HOUSING O.K. FIRE DEPT WILL CHECK SUM & RESET AS NECESSARY.

1430 - MET WITH Opt SHIELDS FOR DAILY RSE REPORTS & CRs

10/13/96 SUN-DAY 0645 - 1845 M T

0918 - HOU @ BLDG 995 (STP) REPORTED

10/13/96 SUN-DAY (CONT.) HIGH ... HE IN... THAT WOU... DRAIN SY... CONTACT ... A PLANAR ... KETONE P... INDICATE... 10/12 AND ... SPIKED A ...

1200 - BLDG ... CALLED CO... ON THE ... CONCERN ... WOULD NOT ... OF WATER ... LEAK SUR... FIRE WATE... CONTACTED ... STATES TH... SINCE ... AND SOE ... 4 SOE'S ... HE STATES ... RCRA ISSU... TO GET ... 881 SOE'S ... AND PLAN... SUM SO...

PART VI - RCRA CONTINGENCY PLAN

A PURPOSE OF PLAN

The Rocky Flats Environmental Technology Site (RFETS) RCRA Contingency Plan is designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, surface or ground water

1 Definitions

The Emergency Coordinator (EC) is responsible for coordinating all emergency response measures as outlined in this RCRA Contingency Plan Reference Part VI (B) for a description of who may serve as the EC and the specific duties of the EC

The RFETS Site Emergency Plan (EPLAN) is a clear and concise description of the overall emergency organization, designation of responsibilities and procedures involved in responding to a situation that has been classified as an "Emergency" by DOE Orders

The Incident Commander (IC) is the on-scene individual responsible for situation management in order to mitigate an "Emergency" as classified by DOE Orders, ensure personnel safety, personnel accountability and facilitate mitigating operations

A release is any spilling leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the air, soil, surface or ground water or into containment (i.e , building or secondary containment) A release involving volatile constituents that escape containment and reach the air will be categorized as a release to the environment

There are four types of responses to releases that are relevant to this RCRA Contingency Plan incidental and emergency as defined in 29 CFR 1910 120, "Emergency" as classified by DOE Orders and emergency as defined by the Interagency Agreement

1) A response to an incidental release includes a response to a release that can be safely absorbed, neutralized, or otherwise controlled at the time of the release by employees in the immediate area or releases that do not pose a potential safety or health hazard

2) An emergency response means a response effort by employees from outside the immediate release area or by other designated responders (e g , HAZ-MAT Team) to an occurrence that results, or is likely to result, in an uncontrolled release of a hazardous substance

3) An incident that has been classified as an "Emergency" per DOE Orders will require implementation of the RFETS Site EPLAN

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A release is any spillin... cting, escaping, leaching, du... to containment (i.e , build... ituents that escape containme... ment.

There are four typ... gency Plan· incidental a... lassified by DOE Orders ar...

1) A resp... at can be safely ... release by emplo... al safety or hea...

2) An em... outside the im... AZ-MAT Team) ... led releas...

3) An inc... s will requir...

Gary -
This waste is RCRA regulated at least for this: D040.
The $MeCl_2$, MEK, and 1,1,1 trec are regulated only if they were used as degreasers or solvents. I would not consider the toluene, ethylbenzene + xylene regulated: they are probably contaminants from gasoline
Please call if you have questions
Celia
x6358

10-24-94

C IMPLEMENTATION OF THE PLAN

The initial discovery, notification, and response for any conditions or events (including non-emergencies) that represent a problem or concern that could have a negative impact on the environment will follow the "Occurrence Reporting Process" procedure The Shift Superintendent will notify and direct EG&G's Notification Center to initiate notifications in accordance with the "Occurrence Notification Process" procedure The Notification Center is the on-site facility charged with making required initial and follow-up notifications to the Director of the CDPH&E and the EPA, Region VIII

When information becomes available on the specific nature of an incident, including such items as type and quantity of released material or injuries incurred, the EC will consult with environmental specialists and other appropriate personnel (as outlined in the Hazardous Waste Requirements Manual) to make a determination whether the incident requires full implementation of the RCRA Contingency Plan (including notification to CDPH&E and EPA, Region VIII) This determination shall be made as soon as possible but no later than 24 hours of discovery of the incident (Note Due to this requirement, the contingency plan may be implemented as a precautionary measure if complete information is not available at the time of the incident Response and cleanup activities will not, however, be delayed awaiting this determination

Figures 1 and 2 present decision trees used at the facility to determine when RCRA Contingency Plan notification and reporting are required As shown in the figures, the RCRA Contingency Plan will be implemented in the following situations

- A hazardous waste incident results in an injury requiring more than first-aid
- A release of a hazardous waste to the air, soil, surface or ground water (i.e a release that occurs outside a building or outside a containment system that is not contained within a building) if the release to the air, soil, surface or ground water is greater than one pint or one pound

  NOTES A release involving volatile constituents that escape containment and reach the air will be categorized as a release to the environment and will require implementation of the RCRA Contingency Plan if more than one pound of hazardous waste was released to the air

  Implementation of the RCRA Contingency Plan may be required for releases of hazardous substances if the released material which, when discharged, becomes a hazardous waste

  Releases of petroleum products or oil from vehicles or diesel powered equipment (e g emergency generators) will be managed per the requirements of this plan except that no verbal notifications or the written followup reports to the Director or EPA will be completed The applicable notifications will be completed, if required by other regulations
- A fire and/or explosion in which a hazardous waste release or an active hazardous waste management unit is involved
- The RCRA Contingency Plan can be implemented in situations other than those outlined above at the discretion of the EC

The response actions outlined in Part VI(D) will be completed for the following situations. The reporting requirements outlined in Part VI(D)(1)(b) and (8) and Part VI (H) will not be required Instead, along with a verbal notification to CDPH&E Emergency Management Unit (EMU), a brief written report describing the date, time, and location of incident, the name, quantity, and extent of released material, and the actions taken or planned to cleanup and/or remove the released material, will be provided by facsimile, no later than the next working day, to the CDPH&E Hazardous Materials and Waste Management (HMWM) Division representative

- A spill, leak, or other release of hazardous waste inside a building results in
  - A release which exceeds a reportable quantity equivalent volume as defined in Title 40 of the Code of Federal Regulations (CFR) Part 302
  - A spilled waste from a hazardous waste tank system not removed from secondary containment within 24 hours

The RFETS Site EPLAN will be implemented for a hazardous waste incident that meets the criteria of an "Emergency" The RFETS Site EPLAN serves as an umbrella to ensure the proper reporting of and response to all imminent or actual "Emergency" situations at the Plant that meet the criteria established in the "Emergency Classification" procedure Examples of "Emergency" situations that may result in implementation of the RFETS Site EPLAN include

- Fire/explosion
- Chemical hazardous materials releases
- Radioactivity releases
- Nuclear excursion/criticality
- Natural disasters, winter storms, high winds/tornados, earthquake, floods
- Civil disturbances
- Terrorist Attack
- Bomb Threat
- Vehicular/Aircraft accident
- Utility failures

For hazardous waste incidents that do not meet the criteria listed above, the response actions outlined in Part VI (D) will be completed except for the off-site notifications to CDPH&E and EPA, Region VIII as outlined in Part VI(D)(1)(b) and (8) In addition, the brief written report outlined in Part VI(C) and the written followup report outlined in Part VI (H) will not be required for these incidents

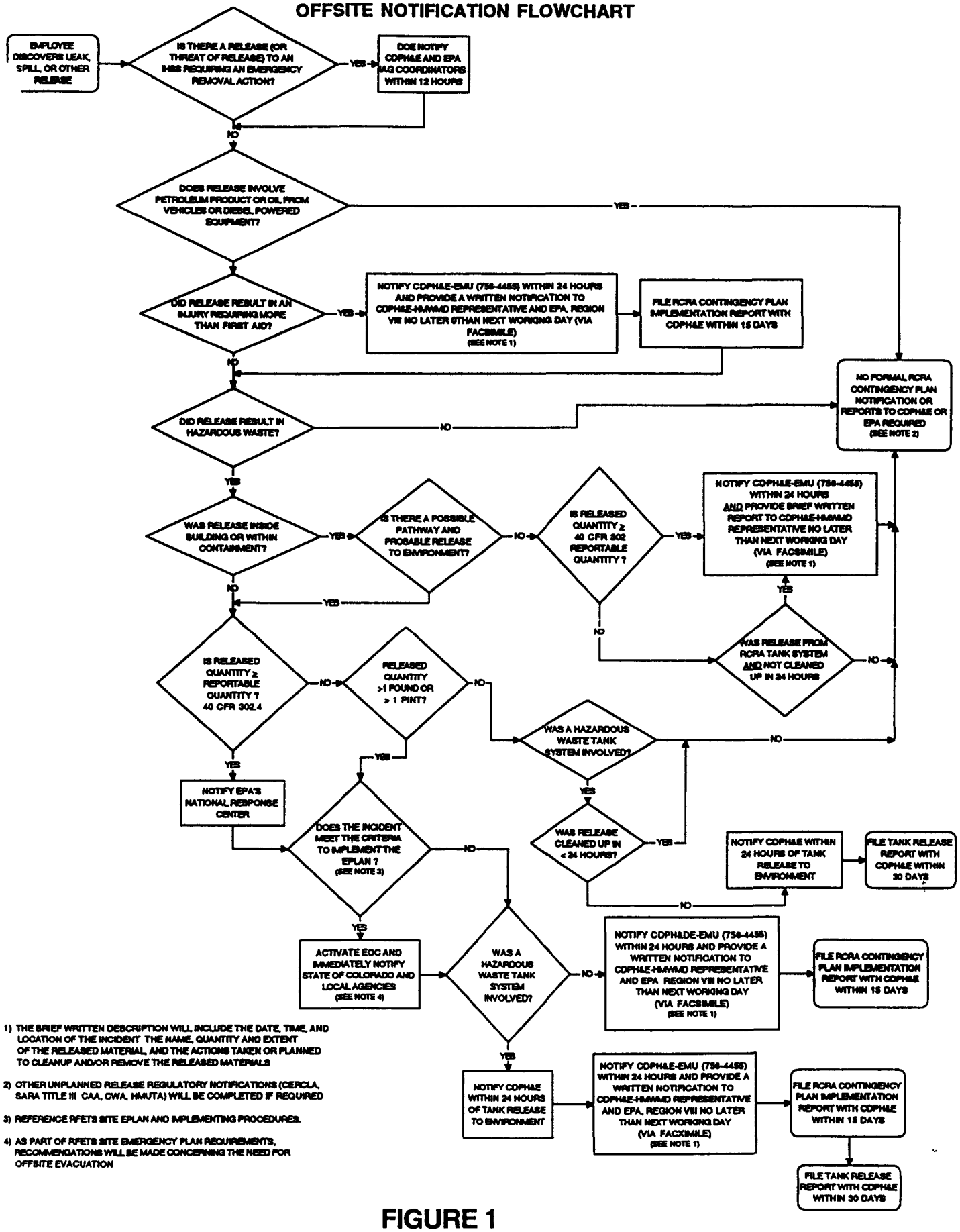
D CONTINGENCY RESPONSE PLAN

Response procedures are incident dependent However, several phases of response efforts are common to all incidents, and include

1 Discovery and notification,
2 Identification of released or suspected released materials,
3 Hazard assessment/consequence assessment,
4 Response and control procedures,
5 Measures to prevent recurrence, and
6 Storage and treatment of released materials

The initial steps of response (incidental or emergency, as defined by 29 CFR 1910 120) to any hazardous waste incident are described in the following sections

HAZARDOUS WASTE RELEASE
OFFSITE NOTIFICATION FLOWCHART



1) THE BRIEF WRITTEN DESCRIPTION WILL INCLUDE THE DATE, TIME, AND LOCATION OF THE INCIDENT THE NAME, QUANTITY AND EXTENT OF THE RELEASED MATERIAL, AND THE ACTIONS TAKEN OR PLANNED TO CLEANUP AND/OR REMOVE THE RELEASED MATERIALS

2) OTHER UNPLANNED RELEASE REGULATORY NOTIFICATIONS (CERCLA, SARA TITLE III CAA, CWA, HMUTA) WILL BE COMPLETED IF REQUIRED

3) REFERENCE RFETS SITE EPLAN AND IMPLEMENTING PROCEDURES.

4) AS PART OF RFETS SITE EMERGENCY PLAN REQUIREMENTS, RECOMMENDATIONS WILL BE MADE CONCERNING THE NEED FOR OFFSITE EVACUATION

FIGURE 1

by the Emergency Preparedness organization Plant personnel will be notified via the LS/DW System and provided with information regarding best routes and methods of transportation In addition to the LS/DW system, two-way radios and the internal telephone system are used to notify facility personnel of the nature of the emergency and the recommended plan of action In the event of the failure of both the normal and emergency power, the EC/IC will communicate instructions to area supervisors by telephone, two-way radio, messenger, etc

d Off-site Evacuation

If a release threatens or may threaten areas off plant site, the RFETS Site EPLAN will have been implemented and the EC/IC will recommend to CDPH&E appropriate protective actions, e g , shelter or evacuation

H REQUIRED REPORTS

The EC/IC will record the date and details of any incident that required the implementation of the RCRA Contingency Plan in the facility operating record For releases that may endanger health or environment (e g , occurrences that have been categorized as an "Emergency"), the Permittee must file a written report with the Director and EPA within 5 days after the incident unless waived by the Director For releases that do not immediately endanger health or environment, the Permittee must file a written report with the Director and EPA within 15 days. The written report must include

- Name, address, and telephone number of the facility owner or operator,
- Name, address, and telephone number of facility,
- Date, time, and type of incident,
- Name and quantity of material(s) involved,
- When applicable, an assessment of actual or potential hazards to human health and the environment, including protective measures taken, and
- Estimated quantity and disposition of recovered material that resulted from the incident

1 Plan Review and Update

Any fires, explosions, or releases that require implementation of the RCRA Contingency Plan will be thoroughly reviewed The appropriate management may appoint a committee which will be responsible for

- Investigation of the cause of the occurrence or incident,
- Identification of measures to prevent a recurrence, and
- Coordination of the implementation measures to reduce risk of a recurrence

OCCURRENCE REPORT

Liquid Waste Treatment
(Name of Facility)

Balance-of-Plant
(Facility Function)

Rocky Flats Env Technology Site / Kaiser-Hill Company, L.L C
(Name of Laboratory, Site or Organization)

Name M Wheeler
Title Facility Manager Telephone No.. (303)966-9878
(Facility Manager/Designee)

Name. JENSEN, J A
Title OCCURRENCE INVESTIGATOR Telephone No.· (303)966-4946
(Originator/Transmitter)

Name R. L Burns Date: 11/04/1996
(Authorized Classifier (AC))

1. OCCURRENCE REPORT NUMBER RFO--KHLL-LIQWASTE-1996-0004
Oak Ridge Tanker Vehicle Hazardous Material Release From Pump Exhaust During Liquid Transfer Operations From Building 774

2 REPORT TYPE AND DATE.

	Date	Time
[ ] Notification	10/17/1996	0918 MTZ
[ ] Initial Update	11/04/1996	1325 MTZ
[ ] Latest Update	11/04/1996	1325 MTZ
[X] Final	11/05/1996	1416 MTZ

3 OCCURRENCE CATEGORY
[ ] Emergency [ ] Unusual [X] Off-Normal [ ] Cancelled

4 NUMBER OF OCCURRENCES· 1 ORIG. OR:

5. DIVISION OR PROJECT Kaiser-Hill Company, L.L.C.

6. SECRETARIAL OFFICE: EM - Environmental Management

7. SYSTEM, BLDG., OR EQUIPMENT:
Building 774 - 765 Parking Lots

8 UCNI?· No

9. PLANT AREA: Asphalt Parking

10. DATE AND TIME DISCOVERED
10/16/1996 1400 (MTZ)

11. DATE AND TIME CATEGORIZED:
10/16/1996 1430 (MTZ)·

12. DOE NOTIFICATION:

13. OTHER NOTIFICATIONS.

10/16/1996	1430 (MTZ)	ON&R, Stewart by Wheeler	DCI
10/16/1996	1628 (MTZ)	SHIFT SUPER, Hebert	K-HILL
10/16/1996	1456 (MTZ)	DOE FAC REP, Bressler	DOE RFFO

14 SUBJECT OR TITLE OF OCCURRENCE
Oak Ridge Tanker Vehicle Hazardous Material Release From Pump Exhaust During Liquid Transfer Operations From Building 774

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15 NATURE OF OCCURRENCE
02) Environmental
B. Hazardous Substances/Regulated Pollutants/Oil Releases

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16 DESCRIPTION OF OCCURRENCE:
On October 10, 11, 1996, liquid transfer operations involving a waste oil from Building 774, contaminated with PCBs and RCRA constituents and a Tanker Vehicle from Oak Ridge, Tennessee were involved in two reportable/incidental releases. During the transfer process, personnel observed liquid exiting the vacuum pumping apparatus through the pump's exhaust/demister unit and was observed dispersing to the ground/paved areas: The liquid was believed to be condensate from the vacuum pump operation

Laboratory analysis indicated the following F001/F002 listed hazardous materials were involved:

a) Trichloroethene/amount 250ppm
b) Methylene Chloride/amount 33ppm
c) 1,1,1-Trichloroethane/amount 930ppm

Further analysis showed less than 2ppm PCB (limit of detection) indicating no PCB contamination of the released liquid by the waste oil.

October 11, 1996 (0245 hours), it was noted on the Fire Departments Serious Incident Report (SIR), that the first spill involved a release of one (1) cup near the front end of the tanker on the roadway outside Building 765 (Tank 308), and one (1) cup east of Building 774 (Tank 102).

October 11, 1996 (1700 hours), the transfer operations resumed at the same locations (as above) and a larger release, approximately one (1) gallon was observed which was also observed dispersing to the ground/paved areas due to failure of a plastic bag that had been placed under the exhaust condensate line after the first two (2) incidents.

NOTE. The releases/spills were immediately cleaned-up by trained/qualified personnel, therefore categorizing the issue as an "incidental release," per 29 CFR 1910.120, INCIDENTAL RESPONSE.

16 DESCRIPTION OF OCCURRENCE: (continued)

NOTE This occurrence report will address both Internally reportable incidents associated with the pumping evolution or operation Rocky Flats Environmental Technology Site (RFETS) Internal tracking numbers #961584 and #961589 will both be combined and addressed chronologically in this occurrence report Based on the completion of laboratory analysis (stated above), a determination to upgrade the incident was made as a result of additional analysis, identifying RCRA Constituents.

17 OPERATING CONDITIONS OF FACILITY AT TIME OF OCCURRENCE:
Scheduled second time transfer operation using the Oak Ridge tanker vehicle and associated vehicle pumping equipment attached to tanker.

18 ACTIVITY CATEGORY·
Facility Decontamination/Decommissioning

19 IMMEDIATE ACTIONS TAKEN AND RESULTS
1) Fire Department personnel performed cleanup using rags. Rags and rubber gloves used for the cleanups were placed into plastic bags and disposed of per Site requirements.

2) A plastic bag was strategically located under/around the exhaust pipe to collect any residual release This action was taken after the first incident during the transfer operation on October 10, 1996

3) A Fact-Finding Meeting was scheduled to review these occurrences and to determine corrective actions to prevent reoccurrence.

20. DIRECT CAUSE.
4) DESIGN PROBLEM
B Inadequate or Defective Design

21 CONTRIBUTING CAUSE(S):

22. ROOT CAUSE.
4) DESIGN PROBLEM
B. Inadequate or Defective Design

23 DESCRIPTION OF CAUSE·
Both the direct and root causes have been attributed to inadequate design and/or poor or lack of maintenance of the tanker by the Oak Ridge K-25 site Numerous physical and design deficiencies were noted as a result of this occurrence.

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24. EVALUATION. (By Facility Manager/Designee)
The representative from the K-25 Site indicated this tanker could be loaded from individual drums in approximately 45 minutes, utilizing a two (2) inch "stinger". Since the loading operation required drawing liquid from Building 774 through a one (1) inch line, an estimate was made that loading would take from two to four hours In fact, actual loading took approximately nine (9) hours. The extended loading time was probably a key factor in generating more condensate than the K-25 site had ever experienced before

Had the tanker arrived on schedule, and had the vacuum pump motor promptly started without assistance from garage personnel, the loading operation may well have been completed in one day, thereby eliminating one shutdown and one startup, in turn reducing the volume of condensate produced.

Obviously the vacuum pump exhaust system is not designed to capture, store, and release condensate on a regular and controlled basis. Several design flaws have been identified, requiring modification

The demister segment of the vacuum system may have accumulated excessive liquid, which in turn may have contributed to excessive condensate generation and release. Draining of the demister is not included in K-25's operating instructions, and was not addressed by the K-25 representative as something that needed to be watched, maintained or drained

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25 IS FURTHER EVALUATION REQUIRED? Yes [ ] No [X]

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26. CORRECTIVE ACTIONS
(* = Date added/revised since final report was signed off)

01) The following modifications/repairs/actions shall be requested of Oak Ridge Tennessee, K-25 Facility, and will be verified by Rocky Flats Environmental Technology Site personnel prior to receipt of this tanker for further shipments:
1) Provide documented repair and/or maintenance of the vacuum pump motor battery, alternator and electrical system gauge.
2) The vacuum pump exhaust muffler shall be equipped with a system or method to drain any accumulated free liquid, as the muffler is the low-point throughout the exhaust system for liquid condensate accumulation.
3) The vacuum pump exhaust pipe shall be fitted with a tight fitting end cap capable of preventing release of accumulated liquids, including those associated with changes in ambient temperatures and pressures while the system is not in operation
4) The exit pipe of the exhaust system shall be relocated farther to the rear of the tanker fender to provide better

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26 CORRECTIVE ACTIONS: (continued)
(* = Date added/revised since final report was signed off)

01) access for a containment system to be placed/attached under the exit pipe The current exit pipe location above the tire and mud flap is difficult, at best, to manage.
5) A schematic diagram and operating instructions for draining the vacuum demister and the entire tanker system will be provided to RFETS. RFETS personnel require a better understanding of the system's capabilities and possible fail points.
6) The K-25 Site shall retrofit the fuel tank to include a fuel gauge. The vacuum pump engine fuel tank does not have a fuel gauge, even though the operating procedure indicates that running the tank dry can cause significant engine damage.
7) A small hydraulic fluid leak at the hydraulic discharge valve at the rear of the tanker shall be repaired
8) Receipt of the tanker should include certification that:
1 Vacuum pump engine fuel tank filled immediately prior to departure from the K-25 site
2. Demister drained.
3 Vacuum exhaust system drained of all free liquids.
4. Battery, alternator, and electrical systems have been serviced and are operable.
RESPONSIBILITY: M. Wheeler, Facility Manager.

*TARGET COMPLETION DATE: 06/30/1997 COMPLETION DATE: Not given

02) RFETS Work Instructions will be modified to include a requirement for adequate closure and sealing of the vacuum exhaust system prior to moving the tanker or leaving it unattended
RESPONSIBILITY: M. Wheeler, Facility Manager

TARGET COMPLETION DATE: 12/31/1996 COMPLETION DATE: Not given

03) Regardless of modifications made to the tanker, adequate, rigid secondary containment will be in place at all times when the exhaust system is not securely sealed.
RESPONSIBILITY: M. Wheeler, Facility Manager.

TARGET COMPLETION DATE: 12/31/1996 COMPLETION DATE: Not given

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27 IMPACT ON ENVIRONMENT, SAFETY AND HEALTH.
There has been determined to have been only minimal impact on the environment which was mitigated, and NO impact upon the health or safety of Site workers involved.

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28. PROGRAMMATIC IMPACT.
There were no identified programmatic impacts as a result of this occurrence.

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29. IMPACT UPON CODES AND STANDARDS:
There were no identified impacts on codes or standards.

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30. LESSONS LEARNED
It is extremely important to become thoroughly and comfortably familiar with any equipment prior to actual usage at RFETS to prevent possible health, safety or environmental problems
Site personnel must continue to maintain a "questioning/inquisitive" attitude to anticipate any potential problems that may arise prior to and during actual operation

Providers of this type of equipment to RFETS must also assume responsibility to anticipate potential fail points and equipment inadequacies, and, to correct these inadequacies as they are identified

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31 SIMILAR OCCURRENCE REPORT NUMBERS·
1) None found

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32. USER FIELD #1
961584, 961589

33 USER FIELD #2

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34 DOE FACILITY REPRESENTATIVE INPUT

Entered by Date:

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35. DOE PROGRAM MANAGER INPUT

Entered by: Date:

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36. SIGNATURES: (FM's original signature on hardcopy)

Approved by M. Wheeler Date: 11/04/1996
Facility Manager/Designee Telephone No : (303)966-9878

Approved by: CHRIST, JOSEF W Date: 11/05/1996
DOE Facility Representative/Designee Telephone No.: (303)966-7717

Approved by: Approval delegated to FR Date:
DOE Program Manager/Designee Telephone No.: